

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COMMUNITY COUPONS FRANCHISING INC and
MATTHEW ROSENCRANS,

Plaintiff(s),

-against-

EAGLE MARKETING SOLUTIONS, LLC and DENNIS
BERNSTEIN,

Defendant(s).

Civ. No. 2:19-cv-04455-JMA-
GRB

Defendant Bernstein's
Interrogatories to Plaintiff
Pursuant to FRCP Rule 33

Defendant, Dennis Bernstein, as and for his Initial Interrogatories to Plaintiff pursuant to
FRCP Rule 26(a) sets demands as follows:


1. Provide a copy of the March 31, 2018 email referred to in paragraph "21" of the Complaint.
2. Provide a description of the statements made at the April 2, 2018 meeting referred to in paragraph "34" of the Complaint and/or provide any notes, writings, or memoranda regarding that meeting.
3. Provide a description of the statements made at the October 16, 2018 meeting referred to in paragraph "37" of the Complaint and/or provide any notes, writings, or memoranda regarding that meeting.
4. Provide a copy of the January 2, 2019 resignation email from the defendant Bernstein to the plaintiff referred to in paragraph "59" of the Complaint.
5. Provide a copy of both sides of all checks issued from the plaintiff to the defendant Bernstein between October 16, 2018 and December 31, 2018.

6. Provide a copy of the commission statement prepared by the plaintiff for the years 2018 and 2019.
7. Provide a copy of the Plaintiff's corporate tax returns for the years 2016 through the present.
8. Name the entities and/or people as others "expressly informed of defendant's intention to resign." as of January 2019 as claimed in paragraph "52" of the Complaint.
9. Provide all documents, writings, checks and/or spreadsheets documenting plaintiff's claim of loss of income and of loss of company value as claimed in paragraph "54" of the Complaint.
10. Provide all terms, duties, responsibilities and/or obligations outlining and/or defining the terms of the claimed oral contract between the parties.
11. Provide the names and identities of the clients/customers that the plaintiff claims the defendant Bernstein contacted "for the express purpose of defamation, libel or slander" as claimed in paragraph "62" of the Complaint.
12. Provide the names and identities of those clients/customers that the defendants allegedly told that the defendants had been "ripped off, poorly treated and taken advantage of," as claimed in paragraph "63" of the Complaint.
13. Provide a description of and/or an accounting of the claim in paragraph "64" of the Complaint that the plaintiff was owed "hundreds of thousands of dollars".
14. Provide the names and/or identities of the clients/customers referred to in paragraph "65" of the plaintiff's Complaint.

15. Provide a list of the clients/customers that the plaintiff claims, in paragraph "66" of the Complaint that were lost as well as receivable information for the years 2016 to the present.
16. Provide a list of all accounts that were "written off" as claimed by the plaintiff in paragraph "67" of the complaint with account receivable information from 2016 to the present.

Dated: White Plains, New York
May 08, 2020

Yours, etc.,



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SUPREME COURT OF THE STATE OF NEW YORK
EASTERN DISTRICT OF NEW YORK

COMMUNITY COUPONS FRANCHISING INC and
MATTHEW ROSENCRANS,

Plaintiff(s),

-against-

EAGLE MARKETING SOLUTIONS, LLC and DENNIS
BERNSTEIN,

Defendant(s).

Civil Action No.
2:19-cv-04455-JMA-GRB

DEFENDANT BERNSTEIN'S INTERROGATORIES TO PLAINTIFF
PURSUANT TO FRCP RULE 33

Pursuant to 22 NYCRR 130-1.1, David S. Klausner, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous. In addition, this matter was not obtained through illegal conduct, or if it was, the attorney or other persons responsible for the illegal conduct are not participating in the matter of sharing in any fee earned there from, and the matter was not obtained in violation of 22 NYCRR 1200.41-a [DR 7-11].

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